

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JAMES AND CYNTHIA GROVES (h/w)

Plaintiff,

v.

WALMART STORES, INC. and
WALMART STORES EAST, L.P.,

Defendants.

CIVIL ACTION

Civil Action No. 18-13005

JURY TRIAL DEMANDED

**Defendant's Memorandum in Response to Plaintiff's
Memorandum in Response to Defendant's Motion for Leave
to File a Third Party Complaint Pursuant to R. 14(a)**

Motion Date: August 3, 2020

In Plaintiffs James and Cynthia Groves' ("Groves" or "Plaintiff") Memorandum in reply to Defendant, Walmart, Inc.'s ("Walmart" or "Defendant") Motion for Leave to File a Third-Party Complaint pursuant to R. 14(a), Plaintiff expressed a desire to "ensure that the matter proceeds expeditiously."

Plaintiff also requested that any Court Order granting leave to file a Third-party Complaint pursuant to R. 14(a) contain the following deadline dates:

- 1) Defendant is to file a third party complaint within seven days of the Court's order granting leave to Walmart to file a third-party complaint pursuant to R. 14(a);
- 2) Walmart is to perfect service within 20 days of such Order;
- 3) Walmart is to furnish the new party with complete copies of all written discovery and pre-trial disclosures within 30 days of the Order.

I. Walmart Will Serve the Third-Party Complaint On HH Technologies Immediately After Receiving Permission To Do So:

Walmart shares the Plaintiff's desire that this matter proceed expeditiously. Walmart has already drafted the Third-Party Complaint and has instructed its process server to serve the Complaint immediately upon receipt of the Court's Order granting it permission to do so.

Respectfully submitted,

COTTRELL SOLENSKY, P.A.

Mark Chereshinsky

By:

Mark Chereshinsky, Esq.

NJ Bar ID: 016842010

Cottrell Solensky, P.A.

3 University Plaza Drive, #500

Hackensack, NJ 07601

T: 973-643-1400 x 17

F: 973-643-1900

(mchereshinsky@cs-njnylawfirm.com)

Our File No.: 25-17-260

Attorneys for Defendant Walmart, Inc.